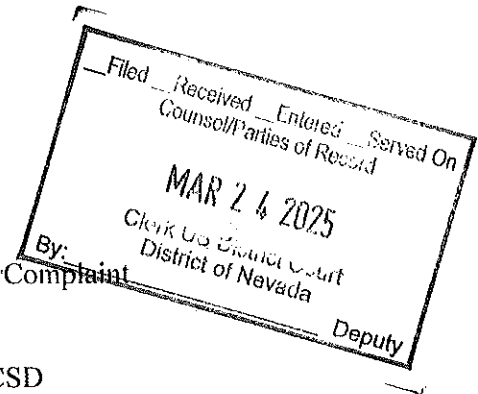


EXHIBIT B

Clean Copy of Proposed First Amended Complaint



Case No.: 3:24-cv-00526-ART-CSD

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA – NORTHERN DIVISION

DREW RIBAR,

Plaintiff,

v.

WASHOE COUNTY; BUILD OUR CENTER, INC.; et al.,

Defendants.

Submitted in Support of:

PLAINTIFF'S MOTION FOR LEAVE TO FILE FIRST AMENDED COMPLAINT

Date: March 24, 2025

1 **UNITED STATES DISTRICT COURT**

2 **DISTRICT OF NEVADA**

3
4 **DREW J. RIBAR,**

5 **Plaintiff, Pro Se**

6 **3480 Pershing Ln**

7 **Washoe Valley, NV 89704**

8 **(775) 223-7899**

9 **Const2Audit@gmail.com**

10
11
12
13 **v.**

14
15 **WASHOE COUNTY, WASHOE COUNTY LIBRARY SYSTEM, JEFF SCOTT, THANH**
16 **NGUYEN, JAMIE HEMINGWAY, BEATE WEINERT, STACY MCKENZIE, JONNICA**
17 **BOWEN, BEN WEST, BUILD OUR CENTER, INC., STACEY SPAIN, ANGELINE**
18 **PETERSON, CHRISTOPHER DANIELS, DEPUTIES ROTHKIN, SAPIDA, GOMEZ,**
19 **KRISTEN RYAN, JENNIFER COLE, and JOHN/JANE DOES 1-10,**

20 **Defendants.**

21
22
23 **Case No.: 3:24-cv-00526-ART-CLB**

24
25
26 **FIRST AMENDED COMPLAINT FOR VIOLATIONS OF CONSTITUTIONAL**
27 **RIGHTS AND STATE LAW**

28 **PLEADING TITLE - 1**

JURY TRIAL DEMANDED

INTRODUCTION

1. Plaintiff, Drew J. Ribar, an independent journalist operating "Auditing Reno 911," brings this action under 42 U.S.C. §§ 1983, 1985(3), the Nevada Constitution, and state law against Defendants for systematic violations of his First, Fourth, and Fourteenth Amendment rights while documenting Washoe County Library System (WCLS) events.
2. Defendants censored Plaintiff's speech, blocked him from social media, assaulted him, detained him without suspicion, imposed baseless suspensions, and defamed him, as evidenced by 32 exhibits (EXH001-EXH317).
3. Plaintiff seeks \$17,000,000 in damages (\$5,000,000 compensatory, \$12,000,000 punitive), nominal damages, injunctive relief to restore social media access and reform WCLS policies, and attorney fees to deter future misconduct.

JURISDICTION AND VENUE

4. This Court has jurisdiction under 28 U.S.C. §§ 1331 (federal question), 1343(a)(3) (civil rights), and supplemental jurisdiction over state claims under 28 U.S.C. § 1367.
5. Venue is proper under 28 U.S.C. § 1391(b) as all events occurred in Washoe County, Nevada, within this judicial district.

PARTIES

6. Plaintiff: Drew J. Ribar, a resident of Washoe Valley, Nevada, operates "Auditing Reno 911," a YouTube channel documenting government activities.

1 **7. Defendants:**

- 2 ○ **Washoe County:** A political subdivision of Nevada, employer of WCLS and
- 3 **sheriff deputies.**
- 4 ○ **Washoe County Library System (WCLS):** A public entity under Washoe
- 5 **County, managing library facilities.**
- 6 ○ **Jeff Scott:** WCLS Library Director, personally involved in assaults and
- 7 **suspensions.**
- 8 ○ **Thanh Nguyen:** WCLS Librarian, assaulted Plaintiff.
- 9 ○ **Jamie Hemingway:** WCLS Public Information Officer, restricted media
- 10 **access.**
- 11 ○ **Beate Weinert:** WCLS employee, involved in event coordination.
- 12 ○ **Stacy McKenzie:** WCLS Assistant Director, enforced unlawful restrictions.
- 13 ○ **Jonnica Bowen:** WCLS Library Manager, issued trespass orders.
- 14 ○ **Ben West:** Washoe County Security Administrator, supported access
- 15 **restrictions.**
- 16 ○ **Build Our Center, Inc. (BOC):** A private entity acting under color of law
- 17 **with WCLS.**
- 18 ○ **Stacey Spain:** BOC Director, coordinated access restrictions.
- 19 ○ **Angeline Peterson:** BOC member, involved in event enforcement.
- 20 ○ **Christopher Daniels:** BOC member, involved in event enforcement.
- 21 ○ **Deputies Rothkin, Sapida, Gomez:** Washoe County Sheriff's deputies,
- 22 **detained Plaintiff.**
- 23 ○ **Kristen Ryan:** WCLS employee, imposed suspensions.
- 24
- 25
- 26
- 27
- 28

- Jennifer Cole: WCLS employee, involved in supervision failures.
- John/Jane Does 1-10: Unknown agents of Defendants, liable for violations.

FACTUAL ALLEGATIONS

- 8. On May 12, 2022, WCLS officials coordinated staffing for Drag Queen Story Hour (DQSH) events, prioritizing Build Our Center (BOC) involvement (Exhibit 1, EXH001-EXH005).**
- 9. On June 14, 2022, WCLS and BOC planned security for DQSH, restricting public access (Exhibit 2, EXH006-EXH010).**
- 10. On June 24, 2022, Jamie Hemingway granted KUNR media access while excluding Plaintiff, evidencing viewpoint discrimination (Exhibit 3, EXH011-EXH012).**
- 11. On June 28, 2022, WCLS increased security due to protests, further limiting public access (Exhibit 4, EXH013-EXH017).**
- 12. From June 24 to July 2, 2022, WCLS and BOC coordinated Pride events, favoring specific groups (Exhibit 5, EXH018-EXH022).**
- 13. From November 14-18, 2022, WCLS and BOC organized DQSH, showing preferential treatment (Exhibit 6, EXH023-EXH026).**
- 14. On January 12, 2023, WCLS discussed handling Plaintiff's recordings, indicating intent to suppress (Exhibit 7, EXH027-EXH032).**
- 15. From January 20 to February 1, 2023, WCLS and BOC planned DQSH logistics, reinforcing exclusionary policies (Exhibit 8, EXH033-EXH039).**
- 16. On February 28, 2023, WCLS responded to media inquiries, deflecting censorship claims (Exhibit 9, EXH040-EXH044).**

1 17. From February 27 to March 22, 2023, WCLS planned RainbowFest, excluding
2 public dissenters (Exhibit 10, EXH045-EXH061).

3 18. On April 26, 2023, WCLS and BOC coordinated volunteers for Pride and DQSH,
4 restricting access (Exhibit 11, EXH062-EXH063).

5 19. On May 5, 2023, WCLS and BOC discussed volunteer roles, further limiting public
6 participation (Exhibit 12, EXH064-EXH069).

7 20. On May 10, 2023, WCLS and Friends of the Library addressed public concerns,
8 maintaining exclusionary policies (Exhibit 13, EXH070-EXH071).

9 21. On June 7, 2023, WCLS planned DQSH security at Reno Library, prioritizing BOC
10 (Exhibit 14, EXH072-EXH074).

11 22. On June 15, 2023, at Reno Library DQSH, Jeff Scott and BOC blocked Plaintiff's
12 recording, confirming BOC as a state actor (Exhibit 27, Video 1).

13 23. On July 15, 2023, at Sparks Library DQSH, Scott assaulted Plaintiff (T/S 1:22:34)
14 and trespassed him, while BOC enforced selective access (Exhibit 28, Video 2).

15 24. On July 6, 2023, Plaintiff requested public records on library policies, met with
16 resistance (Exhibit 15, EXH075-EXH083).

17 25. On April 17, 2024, Plaintiff's LBOT comments were falsified in minutes,
18 misrepresenting his stance (Exhibits 16-17, EXH084, EXH085-EXH092).

19 26. On June 15, 2024, at North Valleys Library DQSH, Thanh Nguyen assaulted
20 Plaintiff (T/S 1:09:11), and staff trespassed him from public areas (Exhibit 29, Video
21 3).

1 27. On June 20, 2024, at Reno Library, Kristen Ryan imposed a 365-day suspension
 2 without notice, with Ann Silver confirming Scott's prior assault (Exhibit 30, Video
 3 4).

4 28. On August 14-16, 2024, Plaintiff appealed his suspension, met with procedural
 5 irregularities and evidence denial (Exhibits 19-23, EXH143-EXH178).
 6

7 29. On August 21, 2024, LBOT upheld Plaintiff's suspension with false claims, denying
 8 due process (Exhibit 31, Video 5; Exhibit 24, EXH190-EXH277).
 9

10 30. On November 12, 2024, at South Valleys Library, deputies Rothkin, Sapida, and
 11 Gomez detained Plaintiff without suspicion, enforcing a baseless trespass claim
 12 (Exhibit 32, Video 6; Exhibit 26, EXH279-EXH311).

13 CAUSES OF ACTION

14 Count I: 42 U.S.C. § 1983 - First Amendment (All Defendants) 31.

15 Defendants censored Plaintiff's speech (Exhibits 3, 27-30), blocked him from WCLS social
 16 media (Packingham v. North Carolina, 582 U.S. 98 (2017); Knight First Amendment Inst.
 17 v. Trump, 928 F.3d 226 (2d Cir. 2019)), and excluded him from libraries (Kreimer v.
 18 Bureau of Police, 958 F.2d 1242 (3d Cir. 1992)).
 19

20 Count II: 42 U.S.C. § 1983 - Fourth Amendment (Scott, Nguyen, Rothkin,
 21 Sapida, Gomez) 32. Defendants assaulted Plaintiff (Exhibits 28, T/S 1:22:34; 29, T/S
 22 1:09:11) and detained him without suspicion (Exhibit 32), violating Terry v. Ohio, 392 U.S.
 23 1 (1968); Hiibel v. Sixth Judicial Dist. Court, 542 U.S. 177 (2004); Florida v. Royer, 460
 24 U.S. 491 (1983).
 25

26 Count III: 42 U.S.C. § 1983 - Fourteenth Amendment Due Process (WCLS,
 27 Scott, McKenzie, Bowen, Ryan) 33. Defendants imposed suspensions without notice or
 28

1 hearing (Exhibits 19-24, 30-31) and falsified records (Exhibit 17), violating *Armstrong v.*
2 *D.C. Pub. Library*, 154 F. Supp. 2d 67 (D.D.C. 2001); *Mathews v. Eldridge*, 424 U.S. 319
3 (1976).

4 **Count IV: 42 U.S.C. § 1983 - Fourteenth Amendment Equal Protection (All**
5 **Defendants) 34. Defendants selectively enforced policies against Plaintiff while favoring**
6 **DQSH supporters (Exhibits 1-14, 27-30), violating *Village of Willowbrook v. Olech*, 528**
7 **U.S. 562 (2000).**

8 **Count V: 42 U.S.C. § 1983 - Monell Liability (Washoe County, WCLS) 35.**
9 **Defendants maintained policies of censorship and exclusion (Exhibits 1-32), establishing**
10 **liability under *Monell v. Dep't of Soc. Servs.*, 436 U.S. 658 (1978).**

11 **Count VI: 42 U.S.C. § 1983 - Conspiracy (All Defendants) 36. Defendants**
12 **conspired to violate Plaintiff's rights through coordinated actions (Exhibits 1-3, 27-32),**
13 **meeting *Adickes v. S.H. Kress & Co.*, 398 U.S. 144 (1970).**

14 **Count VII: 42 U.S.C. § 1985(3) - Conspiracy to Violate Civil Rights (All**
15 **Defendants) 37. Defendants conspired to deprive Plaintiff of rights due to his viewpoint**
16 **(Exhibits 27-30), violating 42 U.S.C. § 1985(3).**

17 **Count VIII: Nevada Constitution, Art. 1, §§ 9, 10 (All Defendants) 38.**
18 **Defendants violated Plaintiff's speech and petition rights (Exhibits 1-32), per *Mack v.***
19 ***Williams*, 138 Nev. Adv. Op. 86 (2022).**

20 **Count IX: NRS 379.040 - Public Library Access (WCLS, Scott, McKenzie,**
21 **Bowen, Nguyen, Hemingway, Weinert, West) 39. Defendants denied Plaintiff library access**
22 **(Exhibits 27-30), violating NRS 379.040.**

1 **Count X: Assault and Battery (Scott, Nguyen) 40. Defendants assaulted**
2 **Plaintiff (Exhibits 28, T/S 1:22:34; 29, T/S 1:09:11), violating NRS 200.481.**

3 **Count XI: Intentional Infliction of Emotional Distress (All Defendants) 41.**
4 **Defendants' extreme conduct (Exhibits 27-32) caused severe emotional distress.**

5 **Count XII: Defamation (All Defendants) 42. Defendants falsely accused**
6 **Plaintiff of misconduct (Exhibit 24), harming his reputation.**

7 **Count XIII: Negligence/Negligent Supervision (Washoe County, WCLS,**
8 **Cole) 43. Defendants negligently supervised staff, leading to false reporting (Exhibit 32).**

9 **Count XIV: NRS 241.035 - Open Meeting Law (WCLS) 44. Defendants**
10 **falsified LBOT minutes (Exhibit 24), violating NRS 241.035.**

11 **PRAYER FOR RELIEF**

12
13
14 **45. Declaratory judgment that Defendants violated Plaintiff's rights under the U.S. and**
15 **Nevada Constitutions and state law.**

16 **46. Permanent injunction ordering Defendants to unblock Plaintiff from WCLS social**
17 **media and reform exclusionary policies.**

18
19 **47. Damages:**

- 20 • **Compensatory: \$5,000,000 (\$1,000,000 for physical injury, Exhibits 28-29;**
21 **\$2,000,000 for emotional distress, Exhibits 27-32; \$1,500,000 for lost income, Exhibit**
22 **32; \$500,000 for reputational harm, Exhibit 24).**
23
24 • **Punitive: \$12,000,000 for willful violations (Exhibits 1-32).**
25
26 • **Nominal: \$1 per violation.**

27 **48. Costs and attorney fees under 42 U.S.C. § 1988.**

28 **49. Such other relief as the Court deems just.**

Dated: March 24, 2025

/s/ Drew J. Ribar

Drew J. Ribar, Pro Se

3480 Pershing Ln.

Washoe Valley, NV 89704

(775) 223-7899

Const2Audit@gmail.com (mailto:Const2Audit@gmail.com)

Attachments: Exhibit Index (EXH001-EXH317)

**Exhibit Index**

**UNITED STATES DISTRICT COURT DISTRICT OF NEVADA - NORTHERN
DIVISION**

**DREW J. RIBAR v. WASHOE COUNTY, NEVADA, et al. Case No.: 3:24-cv-00526-ART-
CLB**

EXHIBIT INDEX FOR FIRST AMENDED COMPLAINT

Exhibit No.	Bates Range	Description
1	EXH001- EXH005	Emails (5/12/22): Internal WCLS communications on DQSH staffing coordination.

PLEADING TITLE - 9

1			
2	2	EXH006- EXH010	Emails (6/14/22): Security coordination for DQSH events between Washoe County officials and BOC.
3			
4			
5	3	EXH011- EXH012	Emails (6/24/22): Public Information Officer Jamie Hemingway discussing KUNR media access while restricting Plaintiff.
6			
7			
8			
9			
10	4	EXH013- EXH017	Emails (6/28/22): Reports on Proud Boys presence and increased security at library events.
11			
12			
13	5	EXH018- EXH022	Emails (6/24/22 - 7/2/22): Internal discussions about Pride event coordination with Build Our Center.
14			
15			
16			
17	6	EXH023- EXH026	Emails (11/14/22 - 11/18/22): DQSH event organization showing preferential treatment for BOC.
18			
19			
20			
21	7	EXH027- EXH032	Emails (1/12/23): Internal library meeting notes discussing handling of Plaintiff's recordings.
22			
23			
24	8	EXH033- EXH039	Emails (1/20/23 - 2/1/23): Communications between WCLS and BOC regarding DQSH event logistics.
25			
26			
27			
28			

1			Emails (2/28/23): WCLS
2	9	EXH040- EXH044	response to media inquiries about DQSH
3			and censorship claims.
4			Emails (2/27/23 - 3/22/23):
5	10	EXH045- EXH061	RainbowFest event planning and public
6			exclusion policies.
7			Meeting minutes (4/26/23):
8	11	EXH062- EXH063	Volunteer coordination meeting for Pride
9			and DQSH events.
10			Notes (5/5/23): RainbowFest
11	12	EXH064- EXH069	volunteer discussions about restricting
12			access.
13			Emails (5/10/23): Internal
14	13	EXH070- EXH071	discussions among Friends of the Library
15			regarding public concerns.
16			Emails (6/7/23): Reno
17	14	EXH072- EXH074	Library DQSH event planning notes.
18			Public records request
19	15	EXH075- EXH083	(7/6/23): Documents related to library
20			policies on access restrictions.

1			Transcript (4/17/24):
2	16	EXH084	Plaintiff's public comments at LBOT
3			meeting.
4			Minutes (4/17/24): Falsified
5	17	EXH085-	LBOT meeting minutes misrepresenting
6		EXH092	Plaintiff's statements.
7			Transcript (6/15/24): AI-
8	18	EXH093-	generated transcription of North Valleys
9		EXH142	Library event.
10			Email (8/14/24): Plaintiff's
11	19	EXH143-	Notice of Appeal regarding suspension.
12		EXH149	
13			Email (8/14/24): Response
14	20	EXH150-	from LBOT confirming suspension despite
15		EXH156	lack of due process.
16			Emails (8/15/24): Additional
17	21	EXH157-	correspondence on suspension appeal and
18		EXH164	evidence requests.
19			Emails (8/16/24): Public
20	22	EXH165-	records requests and due process concerns
21		EXH178	for LBOT hearing.
22			
23			
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23	EXH179- EXH189	Email (8/16/24): Herbert Kaplan's response to Plaintiff's appeal notice.
24	EXH190- EXH277	Transcript (8/21/24): LBOT meeting where Plaintiff's suspension was upheld.
25	EXH278	Email (8/24/24): YouTube privacy complaint against Plaintiff's video.
26	EXH279- EXH311	Transcript (11/12/24): South Valleys Library incident where Plaintiff was detained.
27	EXH312	Video (6/15/23): Reno Library DQSH - Plaintiff's attempts to document event.
28	EXH313	Video (7/15/23): Sparks Library DQSH - Jeff Scott blocking and assaulting Plaintiff.
29	EXH314	Video (6/15/24): North Valleys Library DQSH - Thanh Nguyen assaulting Plaintiff.

1			Video (6/20/24): Reno
2	30	EXH315	Library suspension notice served to
3			Plaintiff.
4			
5	31	EXH316	Video (8/21/24): LBOT
6			meeting upholding Plaintiff's suspension.
7			
8	32	EXH317	Video (11/12/24): South
9			Valleys Library - Plaintiff unlawfully
10			detained by deputies.

11 **Note: Video files (Exhibits 27-32) are submitted separately per Northern District of Nevada**
12 **electronic filing procedures.**